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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
(Portland Division)

ADI ACQUISITION CO., LLC,

Plaintiff,

v.

THEODORE L. VALLAS,

Defendant.

Civil No. 3:18-cv-01871-HZ

**PLAINTIFF'S ITEMIZED LIST OF  
ECONOMIC DAMAGES**

Pursuant to the Court's Court Trial Management Order [ECF No. 26] and Minute Order [ECF No. 34], Plaintiff ADI Acquisition Co., LLC ("Plaintiff" or "ADI Acquisition") submits the following Itemized List of Economic Damages.

1. Principal and interest in the total amount of \$2,456,095.45 is owing to ADI Acquisition due to Defendant's breach of guaranty. See **Exhibit A** attached hereto for detailed support of the principal and interest owing. These damages will be proven through the testimony of Terry Canby and John Beardsley and through Plaintiff's Exhibits 1, 3, 4, and 29.

2. Attorney fees in the amount of \$55,506.50 as of December 31, 2019, are owing to ADI Acquisition due to Defendant's breach of guaranty. These damages will be proven

through the testimony of Terry Canby and John Beardsley and through Plaintiff's Exhibits 1, 3, 4, and 28.

3. Costs in the amount of \$2,003.27 as of December 31, 2019, are owing to ADI Acquisition due to Defendant's breach of guaranty. These damages will be proven through the testimony of Terry Canby and John Beardsley and through Plaintiff's Exhibits 1, 3, 4, and 28.

DATED this 3rd day of February, 2020.

TONKON TORP LLP

By s/ Ava L. Schoen

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**EXHIBIT A**

**Carlsbad-Palomar Airlines, Inc. / Theodore L. Vallas**  
**Note and Guaranty Dated March 20, 2018**  
**Amortization as of January 31, 2020**

				<i><b>Less Payments Made</b></i>	<i><b>Add Interest</b></i>	<i><b>Principal Balance</b></i>	<i><b>Total Balance Excluding Attorney Fees and Costs</b></i>
<b>Beginning Balance March 20, 2018</b>						\$2,032,398.48	
March						2,032,398.48	
April						2,032,398.48	
May					\$20,323.98	2,052,722.46	
June	1st	Ck#20001	\$20,323.98	20,527.22		2,052,925.70	
June	15th	Ck#20013	20,323.98	20,529.26		2,053,130.98	
July	23rd	EFT	20,323.98	20,531.31		2,053,338.31	
August				20,533.38		2,073,871.69	
September				20,738.72		2,094,610.41	
October				20,946.10		2,115,556.51	
November				21,155.57		2,136,712.08	
December				21,367.12		2,158,079.20	
<b><u>2019</u></b>							
January				21,580.79		2,179,659.99	
February				21,796.60		2,201,456.59	
March				22,014.57		2,223,471.16	
April				22,234.71		2,245,705.87	
May				22,457.06		2,268,162.93	
June				22,681.63		2,290,844.56	
July				22,908.45		2,313,753.01	
August				23,137.53		2,336,890.54	
September				23,368.91		2,360,259.45	
October				23,602.59		2,383,862.04	
November				23,838.62		2,407,700.66	
December				24,077.01		2,431,777.67	
<b><u>2020</u></b>							
January				24,317.78		\$2,456,095.45	
February							
March							
				<b>\$60,971.94</b>	<b>\$484,668.91</b>		<b>\$2,456,095.45</b>

037840/00005/10666024v1

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **PLAINTIFF'S ITEMIZED LIST  
OF ECONOMIC DAMAGES** on:

Theodore L. Vallas  
Carlsbad-Palomar Airlines, Inc.  
2100 Palomar Airport Road, #222/223  
Carlsbad, CA 920011  
[Vallas1@cox.net](mailto:Vallas1@cox.net)  
[tgallas@gmail.com](mailto:tgallas@gmail.com)

by mailing a copy thereof in a sealed, first-class postage prepaid envelope, addressed to said party's last-known address and depositing in the U.S. mail at Portland, Oregon on the date set forth below; and by causing a copy thereof to be e-mailed to said party at said party's last-known email addresses on the date set forth below.

DATED this 3rd day of February, 2020.

TONKON TORP LLP

By s/ Ava L. Schoen

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